

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

INNOVATIVE GLOBAL SYSTEMS LLC,

Plaintiff,

v.

VOLVO CONSTRUCTION EQUIPMENT  
NORTH AMERICA, INC., et al.,

Defendants.

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CIVIL ACTION NO. 6:10-cv-00327

**JURY TRIAL DEMANDED**

**PLAINTIFF'S SECOND UNOPPOSED MOTION TO  
EXTEND P.R. 3-1 DEADLINE AS TO ONE PARTY**

NOW COMES Plaintiff INNOVATIVE GLOBAL SYSTEMS LLC ("IGS") to file its Second Unopposed Motion to Extend its P.R. 3-1 Deadline as to One Party, and shows the Court as follows:

1. Plaintiff requests that its deadline to serve its P.R. 3-1 disclosure with respect to WIRELESS MATRIX USA, LLC ("Wireless Matrix") be extended through and including November 22, 2010. The purpose is to determine whether the Parties' negotiations regarding a resolution of Plaintiff's claims can be brought to fruition. Wireless Matrix does not oppose this motion.

2. Plaintiff has complied with its P.R. 3-2 deadline with respect to Wireless Matrix and its P.R. 3-1 and P.R. 3-2 disclosure deadline with respect to Defendants Volvo Construction Equipment North America, Inc., Volvo Trucks North America, Inc., Komatsu American Corp., Caterpillar, Inc., Topcon Tierra, StarTrak Systems, LLC, and JLG Industries Inc.

**Dated: November 12, 2010**

Respectfully submitted,

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**ATTORNEYS FOR PLAINTIFF  
INNOVATIVE GLOBAL SYSTEMS, LLC**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 12th day of November, 2010, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Eastern District of Texas, Tyler Division, using the electronic case filing system of the court. The electronic case filing system sent a "Notice of Electronic Filing" to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

/s/ Michael T. Cooke